



COMMENT RESPONSE DOCUMENT

EASA PAD No. 18-179

[Published on 17 December 2018 and officially closed for comments on 14 January 2019]

Commenter 1: Delta Air Lines – Brandon Soileau – 15/01/2019

Comment # 1

References:

- (A) EASA PAD 18-179
- (B) Airbus A330 ALS Part 3 Rev. 05
- (C) Airbus A330 ALS Part 3 Rev. 06

SUMMARY: Reference (A) was created to move the Aircraft Maintenance Program Certification Maintenance Requirements from Reference (B) to Reference (C).

COMMENTS: Based upon the upcoming release of Airbus A330-800/900 (NEO) aircraft, with subsequent revised TCDS documents, Delta Air Lines recommends delaying the EASA AD until such time as a complete set of ALS documents (Parts 1 through 6) can be released. This will allow operators to only make one revision to their AMP, rather than making one update for Reference (B) and then making a second change to Rev. 07 when the A330-800/-900 (NEO) is released. Airbus has commented to Delta that additional changes to ALS documents, driven by the A330-800/900 (NEO) aircraft, are in work. As this indicates that Airbus has not finished defining these ALS changes, and both A330-200/300 and A330-800/900 will be in service at the same time, an equivalent level of safety must exist, therefore delaying implementation of the A330 ALS Part 3 until Rev. 07 will not create an unsafe condition.

A related comment would be that Airbus A330 ALS Part 3 should be revised by Airbus to more clearly direct the Certification Maintenance Requirement tasks to the corresponding maintenance manuals, such as the AMM or AMP. The current A330 ALS Part 3 document identifies MRBR tasks, which do not always directly correspond to AMM instructions, complicating the creation of scheduled maintenance activities.

EASA response:

Comment not agreed. EASA do not see the need to delay issuance of the AD until A330 ALS Part 3 Rev. 07 is published by Airbus.



Note that the Final AD does not apply – as the PAD indicated – to A330-941 aeroplanes. Regulation requires operators of newly delivered A330-941 aeroplanes to prepare an AMP by incorporating the latest available maintenance tasks and associated thresholds and intervals. A330 ALS Part 3 Rev. 06 is applicable to A330-941 and is already the minimum standard ALS for this model. For this reason, the AD does not (need to) apply.

When Airbus A330 ALS Part 3 Rev. 07 is published, and if this revision contains new or more restrictive maintenance tasks for A330-941 aeroplanes, a new AD should be prepared, this time applicable to A330-941 aeroplanes. In general, it is EASA policy to issue an AD for each ALS full revision, if this contains new or more restrictive maintenance tasks. For A330-941 aeroplanes, which should have an AMP already containing the tasks of Airbus A330 ALS Part 3 Rev. 06, only the new or more restrictive tasks contained in A330 ALS Part 3 Rev. 07 will have to be incorporated.

The same logic will apply when the A330-841 aeroplane is certified and delivered.

As for the “related comment”, EASA consider that this should be addressed directly to Airbus.

No changes have been made to the Final AD in response to this comment.

